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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 (SAN FRANCISCO DIVISION)**

TOKIO MARINE & FIRE INSURANCE  
 COMPANY

Plaintiff,

v.

M/V SAGA HORIZON, her engines, tackle,  
 machinery, appurtenances, etc., in rem; and  
 SAGA FOREST CARRIERS  
 INTERNATIONAL A/S, in personam,

Defendants.

CASE NO.: (CV 05-03118 SI)

**PLAINTIFF'S REQUEST TO  
 RESCHEDULE CASE MANAGEMENT  
 CONFERENCE FROM 1 DECEMBER  
 2005 TO 13 JANUARY 2005 AND  
 PROPOSED REVISED CASE  
 MANAGEMENT CONFERENCE  
 SCHEDULE**

COMES NOW PLAINTIFF Tokio Marine & Fire Insurance Company ("Plaintiff") and moves and requests the Court reschedule the Case Management Conference, pursuant to Fed. R. Civ. Proc. 16 (b) and Civil L. R. 16-2 and 16-10, from the ordered date of 1 December 2005 until on or about 13 January 2006.

Plaintiff brings this request without stipulation because, at the time of this filing, the Defendants have not yet appeared in this action. Plaintiff requests this extension of time due to the above referenced nonappearance and consequent inability to formally comply with this

Courts' Case Management Conference Order.

WHEREFORE, Plaintiff requests this Court reschedule the Case Management Conference to on or about 13 January 2005, as noted above, or as soon thereafter as is convenient for the Court.

Plaintiff proposes the following dates anticipating a rescheduling of the Case Management Conference from 1 December 2005 until on or about 13 January 2006:

- |            |   |
|------------|---|
| 12/19/2005 | Last day to meet and confer re initial disclosures, early settlement, ADR process selection, and discovery plan pursuant to Fed. R. Civ. Proc. 26 (f) & ADR Local Rule 3-5.   |
| 12/19/2005 | Last day to file Joint ADR Certification with Stipulation to ADR process or Notice of Need for ADR Phone Conference pursuant to Local Rule 16-8.  |
| 1/9/2006   | Last day to complete initial disclosures or state objection in Rule 26 (f) Report, file/serve Case Management Statement, and file/serve Rule 26 (f) Report pursuant to Fed. R. Civ. Proc. 26 (a) (1) and Civil Local Rule 16-9. |
| 1/13/2006  | Case Management Conference.   |

Dated: November 28, 2005

**LAW OFFICES OF GEORGE W. NOWELL**

By: \_\_\_\_\_ /S/  
 JOHN H. CIGAVIC III  
 Attorneys for Plaintiff  
 TOKIO MARINE & FIRE INSURANCE  
 COMPANY

